

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
JOANN INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
	)	(Jointly Administered)
Debtors.	)	
	)	Related Dkt. No. 303, 338

**CERTIFICATE OF NO OBJECTION REGARDING ORDER AUTHORIZING THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO FILE UNDER SEAL  
EXHIBIT D OF ITS OMNIBUS OBJECTION TO DEBTORS' MOTIONS (I) FOR  
ENTRY OF AN ORDER APPROVING BIDDING PROCEDURES AND STALKING  
HORSE AGREEMENT; AND (II) FOR ENTRY OF A FINAL ORDER AUTHORIZING  
THE USE OF CASH COLLATERAL**

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The undersigned counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned Debtors under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), hereby certifies that:

1. On February 12, 2025, the Committee filed the *Motion for an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Exhibit D of its Omnibus Objection to Debtors’ Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral* [Docket No. 398] (the “Motion”).

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<sup>1</sup> The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

2. Pursuant to the Notice filed with the Motion, objections to entry of an order granting the Motion were due at the hearing held on February 14, 2025 at 9:30 a.m. (ET) (“the “Hearing”).

3. The undersigned has caused the Court’s docket in this case to be reviewed, and no answer, objection or other responsive pleadings to the Motion appears thereon. Additionally, no objections to the Motion have been received by the undersigned counsel nor received at the Hearing.

Accordingly, the Committee respectfully requests that the proposed order attached as **Exhibit A** to the Motion be entered at the Court’s earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: February 27, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

By: /s/ James E. O'Neill

Bradford J. Sandler (DE Bar No. 4142)

James E. O'Neill (DE Bar No. 4042)

919 North Market Street, 17<sup>th</sup> Floor

P.O. Box 8705

Wilmington, DE 19801

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: bsandler@pszjlaw.com

joneill@pszjlaw.com

- and -

**KELLEY DRYE & WARREN LLP**

Jason R. Adams (admitted *pro hac vice*)

Eric R. Wilson (admitted *pro hac vice*)

William S. Gyves (admitted *pro hac vice*)

Maeghan J. McLoughlin (admitted *pro hac vice*)

3 World Trade Center

175 Greenwich Street

New York, NY 10007

Tel.: (212) 808-7800

Email: jadams@kelleydrye.com

ewilson@kelleydrye.com

wgyves@kelleydrye.com

mmcloughlin@kelleydrye.com

*Proposed Co-Counsel to the Official Committee  
of Unsecured Creditors*